

From: Mia, Marcia
Sent: Tuesday, June 18, 2019 12:43 PM
To: Marsh, Karen
Subject: RE: NSPS-0000a - Pneumatic Pumps

Cool. I will check it out.

Marcia B Mia
Air Branch
Office of Compliance
2227A WJCS
U.S. Environmental Protection Agency
202-564-7042

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-----Original Message-----

From: Marsh, Karen
Sent: Tuesday, June 18, 2019 8:40 AM
To: Mia, Marcia <Mia.Marcia@epa.gov>
Subject: FW: NSPS-0000a - Pneumatic Pumps

Marcia,

Just letting you know she found her answer in the small entity guide. ☐ Not sure what her answer was, but hey...looks like the effort for that guide was well spent.

Karen R. Marsh, PE
US EPA, OAQPS, Sectors Policies and Programs Division Fuels and Incineration Group
109 TW Alexander Drive, Mail Code E143-05 Research Triangle Park, NC 27711
Direct: (919) 541-1065; email: marsh.karen@epa.gov

-----Original Message-----

From: Meghan Mack <mmack@hlpengineering.com>
Sent: Monday, June 17, 2019 3:51 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>
Cc: Jamie Nease <jnease@hlpengineering.com>
Subject: RE: NSPS-0000a - Pneumatic Pumps

Hi, Karen! Thank you for the response. I actually found a guidance document from EPA (Small Entity Compliance Guide) after I emailed you that answered my questions.

<https://www.epa.gov/sites/production/files/2016-08/documents/2016-compliance-guide-oil-natural-gas-emissions.pdf>

-----Original Message-----

From: Marsh, Karen <Marsh.Karen@epa.gov>
Sent: Monday, June 17, 2019 2:48 PM
To: Meghan Mack <mmack@hlpengineering.com>
Cc: Jamie Nease <jnease@hlpengineering.com>
Subject: RE: NSPS-0000a - Pneumatic Pumps

Hi Meghan,

I wanted to let you know I did receive your email and question. I'm working on a response but the person with more familiarity with the pump standards is out until Wednesday. If ok, I'd like to confer with him. If you need something sooner, I will work to provide something.

Karen

Karen R. Marsh, PE
US EPA, OAQPS, Sectors Policies and Programs Division Fuels and Incineration Group
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-----Original Message-----

From: Meghan Mack <mmack@hlpengineering.com>
Sent: Thursday, June 13, 2019 4:06 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>
Cc: Jamie Nease <jnease@hlpengineering.com>
Subject: NSPS-0000a - Pneumatic Pumps

Hi, Karen-

I need some clarification on NSPS-0000a pneumatic pumps. When looking at the requirements for a 0000a applicable pneumatic pump (40 CFR 60.5393a), do requirements for the "control device" fall back to 40 CFR 60.18? In other words, if a flare is used as the control device to comply, is the flare required to meet 60.18(b) - well (c) through (f)?

And, if there is a control flare on site that does not meet 60.18.. and a 0000a applicable pump is installed and you are required to route the vapors to the control device (cannot claim infeasibility under 5393a(b)(5)), are you required to modify or change out the flare to one that meets 60.18?

P.S. I tried calling due to this being time-sensitive, but caught your voicemail ☐

Meghan C. Mack
Air Compliance Engineer

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